Defendant has filed its Disclosure of Non-Party Interested Entities pursuant to Civil L.R. 3-16. Defendant Protective Life Insurance Company, successor-in-interest to Chase Insurance Life and Annuity Company, formerly known as Federal Kemper Life Assurance Company, certifies that the following listed persons, associations of persons, firms, partnerships, corporations (including parent corporations) or other entities (i) have a financial interest in the subject matter in controversy or in a party to the proceeding, or (ii) have a non-financial interest in that subject matter or in a party that could be substantially affected by the outcome of this proceeding:

Federal Kemper Life Assurance Company ("Federal Kemper") was formerly owned by Zurich Life. Bank One purchased Zurich Life in September 2003. In July 2004, JP Morgan Chase purchased Bank One and created Chase insurance companies, at which time Federal Kemper was renamed Chase Insurance Life and Annuity Company ("Chase Insurance"). Protective purchased Chase Insurance in July 2006. Chase Insurance merged into Protective in April 2007. Protective Life Insurance Company is wholly owned by Protective Life Corporation, a publicly held corporation.

DATED: October 12 2007.

KEMP & KEMP

James F. Kemp

Attorney for Plaintiff and Cross-Defendant Mary Turtle

DATED: October ___, 2007.

REED SMITH LLP

By_______ Linda B. Oliver
Attorneys for Defendant and Cross-Complainant
Protective Life Insurance Company, successor-ininterest to Chase Insurance Life and Annuity
Company, formerly known as Federal Kemper Life

Assurance Company

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and Annuity Company, formerly known as Federal Kemper Life Assurance Company, certifies that the following listed persons, associations of persons, firms, partnerships, corporations (including parent corporations) or other entities (i) have a financial interest in the subject matter in controversy or in a party to the proceeding, or (ii) have a non-financial interest in that subject matter or in a party that could be substantially affected by the outcome of this proceeding:

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DATED: October 18, 2007. KEMP & KEMP

By

James F. Kemp

Attorney for Plaintiff and Cross-Defendant Mary Tuttle

DATED: October 18, 2007.

REED SMITH LLP

By Jes#ica M. Perrv

> Attorneys for Defendant and Cross-Complainant Protective Life Insurance Company, successor-ininterest to Chase Insurance Life and Annuity Company, formerly known as Federal Kemper Life Assurance Company

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